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Philadelphia Suburban Water Company

762 W. Lancaster Avenue, Bryn Mawr, Pennsylvania 19010-3489 610-525-1400

August 17, 1995

Charles Root, Project Manager
3HW21
USEPA Region III
841 Chestnut Street
Philadelphia PA 19107-4431

Dear Mr. Root:

Many of the limits which have been proposed for a stream discharge to Valley Creek from the AIW Frank/Mid-County Mustang groundwater remediation project meet or exceed drinking water standards. Others, however, do not. Both the maximum daily and the instantaneous maximum limits for TCE are above the drinking water MCL. The total dissolved solids and total suspended solids limits would not be acceptable for a potable water supply. Furthermore, there are 83 regulated drinking water parameters, many of which are not addressed in the proposed discharge limits or monitoring requirements for the remediation system. There is also the potential for discovering as yet unregulated contaminants in the discharge.

The level of influent contaminant concentrations and the performance of the proposed treatment is not yet known. A March 28, 1994 letter from David Ewald to PaDER stated "Alternative treatment methods . . . may be required to remove organics if air stripping and carbon adsorption are inadequate to meet organic effluent limits."

Given these issues, Philadelphia Suburban Water Company (PSWC) could not at this time seriously entertain a proposal to use the discharge from the groundwater remediation as a potable water source. The disparate goals of ensuring a high quality public water supply and achieving site clean-up under strict EPA requirements present serious complications and obstacles (technical, legal and political) to such a proposal.

PSWC is anxious to see progress on remediation at this site to arrest migration of contaminants moving in the direction of public water supply wells which serve West Whiteland. PSWC is also interested in seeing that water discharged to the stream which could infiltrate to the groundwater supplying these wells is adequately treated. Both of these conditions appear to be met satisfactorily by EPA's proposed remedy.

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We are aware of reported concerns over increased flows to Valley Creek. However, the proposed discharge from the groundwater remediation system would be small relative to stormwater flows in that drainage basin. Any incremental flooding risk could be addressed by means such as 1) shutting down the treatment system during and after heavy rainfall events, or 2) providing stormwater detention on the site to intercept and store peak runoff flow equivalent to the proposed discharge.

Thank you for the opportunity to comment on the proposed remedy for this site. Please keep PSWC informed on the progress of site activities. If in the future an opportunity arises for PSWC to participate in advancing the remediation, we will be glad to explore it with EPA.

Sincerely,



Preston Luitweiler, P.E.
Manager
Research & Environmental Affairs

cc: Thomas L. Yohe, Ph. D.
Morrison Coulter
Richard Hugus

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